

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE NEURONTIN MARKETING AND
SALES PRACTICES LITIGATION

MDL Docket No. 1629

THIS DOCUMENT RELATES TO:

Master File No. 04-10981

LAURA ALLEN, ADMINISTRATRIX
OF THE ESTATE OF THE LATE
DANIEL ALLEN, TIMOTHY BRIDGES,
and ALFRED MORABITO, individually
and on behalf of themselves and all others
similarly situated,

Judge Patti B. Saris

Civil Action No. 05-10797

Plaintiffs,

v.

PFIZER, INC. and PARKE-DAVIS,
a division of Warner-Lambert Company

Defendants.

**PLAINTIFFS LAURA ALLEN, ADMINISTRATRIX
OF THE ESTATE OF THE LATE DANIEL ALLEN, TIMOTHY BRIDGES AND
ALFRED MORABITO'S INITIAL DISCLOSURES PURSUANT TO RULE 26 (A)(1)**

The Plaintiffs, Laura Allen, Administratrix of the Estate of the Late Daniel Allen, Timothy Bridges and Alfred Morabito, without waiving any claim of attorney client privilege or work product protection, hereby submit their Fed.R.Civ.P. 26(a)(1) initial disclosures. These disclosures do not include information that may be used solely for impeachment and/or rebuttal purposes. Plaintiffs reserve the right to supplement and/or modify these disclosures and to introduce additional information in connection with any motion, hearing or trial as discovery

proceeds.

A. Individuals Likely to Have Discoverable Information

Based on their investigation to date, Plaintiffs state that the following individuals are potential fact witnesses who are known or believed to have substantial discoverable information about the claims or defenses in this action:

1. Laura Allen – Mrs. Allen is the widow of and Administratrix of the Estate of the late Daniel Allen.
2. Timothy Bridges – Plaintiff in this case.
3. Alfred Morabito – Plaintiff in this case.
4. Pharmacists who filled prescriptions for Plaintiffs.
5. Other persons identified in any parties' Rule 26 Initial Disclosures.

Plaintiffs will supplement their initial disclosures if it is determined that any other individuals have relative information related to the claims.

Experts, if any, will be disclosed in accordance with the Court's scheduling orders.

B. Categories and Location of Documents, Date, or Tangible Things in the Possession, Custody, or Control of Plaintiffs Believed to be Relevant to Disputed Facts In Pleadings

Based on its investigation to date, Plaintiffs state that they may use the following categories of documents, data compilations, and/or tangible things:

1. Pharmacy/prescription records for Plaintiffs Allen, Bridges and Morabito.
2. The label and/or prescribing information for Neurontin in the United States and other countries;
3. Any documents produced by the defendants in this litigation including all their

business records; and

4. All documents that may be useful in proving the Plaintiffs' claims discovered during the litigation of this case.

C. Computation of Damages Claimed

Due to the complexity of the case and the lack of any formal discovery, Plaintiffs do not have adequate information to estimate damages.

When a computation of the Plaintiffs' damages occurs, that computation is likely to be based on documents in the exclusive possession of Defendants, the testimony of one or more expert economists, and other relevant evidence discovered in this case from other parties, expert witnesses, and third parties.

D. Insurance Agreements

Based on its investigation to date, Plaintiffs know of no insurance agreements relevant to this case.

Plaintiffs reserve the right to supplement any and all of the above disclosures in accordance with Fed.R.Civ. P. 26(e).

DATED: June 3, 2005

/s/ Robert J. Bonsignore
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